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February 16, 2021

**BY CM/ECF**

The Honorable Richard G. Andrews  
United States District Judge  
U.S. District Court for the District of Delaware  
844 North King Street, Unit 9, Rm. 6325  
Wilmington, DE 19801

RE: Discover Growth Fund, LLC v. Generex Biotechnology Corp., et al.  
C.A. No. 20-233-RGA

Dear Judge Andrews:

I represent Defendants in this matter. Defendants acknowledge a discovery dispute has arise between the Parties. Counsel for Defendants have worked diligently with Defendants to attempt to navigate and resolve the disputes, although it is apparent such disputes remain. Defendants proposed resolution to the dispute is to meet its obligations under the Amended Judgment, and satisfy it. To that end, on February 10, 2021, Plaintiff provided wiring instructions, and Defendants paid \$800,000.00 toward the judgment balance. Defendants have further obtained financing for an additional \$1.5 million which is currently scheduled to close today, February 16, 2021. Upon receipt of such funds, Defendants intend to immediately pay the full amount towards the judgement balance.

Given Defendants have now acted on their obligations under the judgment, and have taken concrete steps to fully satisfy such obligations imminently, Defendants respectfully request a temporary stay of discovery pending satisfaction of the judgment.

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Respectfully submitted,

*/s/ David C. Zerbato*

David C. Zerbato, Esq. (No. 5671)

cc: Clerk (by CM/ECF)  
Christopher Viceconte, Esq. (by Email and CM/ECF)